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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
AT EUGENE

LEONARD WILLIAMSON,) Case No. 6:16-CV-00783-MC
)
Plaintiff,)
)
v.) **Declaration of Keith J. Bauer in Support of
OREGON DEPARTMENT OF) Defendants' Motion to Dismiss and Motion
CORRECTIONS, an Oregon State Agency,) to Strike
and COLETTE PETERS, an individual, in her)
personal capacity,)
Defendants.)**

I, Keith J. Bauer, am an adult and am competent to make this declaration. I make this declaration in support of Defendants Oregon Department of Corrections and Colette Peters' Motion to Dismiss. I have personal knowledge of the facts discussed herein.

I am the attorney representing Oregon Department of Corrections and Colette Peters, in the above case.

Attached to my declaration as Exhibit A is a true copy of the November 14, 2013 unpublished Order of Lane County Circuit Court Judge Charles D. Carlson in the matter of *Dawn Reynolds v. City of Eugene, an Oregon municipal corporation*, Case No. 16-11-02847.

Attached to my declaration as Exhibit B, is a true copy of the June 16, 2016 Order issued by United States District Court Judge Michael J. McShane, in the matter of *Victorina Mata v. Oregon Health Authority, an agency of the State of Oregon, et al.*, Case No. 6:13-cv-485-MC.

Attached to my declaration as Exhibit C is a true copy of the minutes of the House Committee on Business and Labor dated April 10, 2009, which included a public hearing on HB 3162.

Attached to my declaration as Exhibit D is a true copy of a transcription of an excerpt of the proceedings before the House Committee on Business and Labor dated April 10, 2009 regarding HB 3162, with certain portions underlined.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 1, 2016.

/s/ Keith J. Bauer
